

SIMPSON FOR CONGRESS

1487 Parkway Drive , Blackfoot , Idaho 83221

FEDERAL ELECTION COMMISSION
2013 SEP 13 10 11 AM '13

Sam Jordan, Supervisory Attorney
Office of Complaints, Examination and Legal Administration
Federal Election Commission
999 E. Street NW
Washington, DC 20463

Re: **Complaint against Simpson for Congress**
MUR 6752

Dear Mr. Jordan:

I serve as Treasurer for the Simpson for Congress committee, the principal committee of Congressman Simpson. I am in receipt of your August 30, 2013 correspondence referencing a complaint filed against the campaign. Hopefully this correspondence will demonstrate why no action should be taken against the Simpson for Congress committee in regard to the complaint filed by Mr. Urling.

First and foremost, the complaint is missing any factual claims against the Simpson for Congress committee. The complaint fails to cite exactly what Mr. Urling believes the campaign did wrong. It is clear Mr. Urling feels that an unrelated third party, the Idaho Association of Realtors, used corporate assets to facilitate contributions to the Simpson campaign however he does not state how he believes the campaign played any role in this alleged wrongdoing. He does not imply that we controlled, directed or for that matter, even knew about it.

Second, the facts of the matter pertaining to the Simpson campaign are simple and there was no violation. The invitation in question was circulated to tens of thousands of people, associations, and organizations all within the boundaries of the law. The invitation contained the appropriate disclosures and was completely legal. A copy of the invitation which was paid for, printed and circulated by the campaign is attached. To the extent that the campaign requested other people further circulate the invitation, we assumed that those

entities would do so within the boundaries of the law. The campaign places a high value on compliance issues and when any legal question arises it is the campaign's policy to direct those questions to the appropriate compliance personnel.

The campaign staff has been assured by the Idaho Association of Realtors that their email went only to a "restricted class" of people whom they may freely solicit. Therefore there appears to be no violation whatsoever in regard to the Realtor Association's conduct let alone the campaign conduct. The campaign has no knowledge of the specific facts of who they circulated the invitation to, nor did it, or could it, control the actions of this third party association. I am informed their reply, which will be filed with the FEC will demonstrate this in detail.

At no time did Simpson for Congress accept or receive any benefit from any contribution allegedly facilitated by the use of corporate resources. Therefore Simpson for Congress requests that this complaint against it be dismissed with no further action taken.

If you have any questions or concerns regarding this matter, please feel free to contact me at, (208) 785-7234.

Sincerely,



9/16/13

T. Layne Van Orden, Treasurer



Congressman Mike Simpson
and the
Idaho Association of REALTORS®

Invite you to a special visit with:

Speaker John Boehner
U.S. House of Representatives

11:30 am
Monday, August 26, 2013
Boise Centre on the Grove

\$50 per person
Lunch will be served

Reply by Friday, August 23
by email to Kendra@simpsonforcongress.com
or by calling 208-367-1927

Please make checks payable to:
"Simpson for Congress"

Mike
SIMPSON
IDAHO'S CONGRESSMAN